

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

| | | |
|-------------------------|---|-------------------------------------|
| Latasha Holloway |) | |
| |) | |
| Plaintiff, |) | |
| |) | Case No.: <u>2:18-cv-69-AWA-RJK</u> |
| |) | |
| v. |) | |
| |) | |
| City of Virginia Beach, |) | |
| |) | |
| Defendant. |) | |
| _____ |) | |

**PLAINTIFF’S MOTION TO FILE AN AMENDED COMPLAINT AND WITHDRAW
ALL OTHER PENDING MOTIONS**

In light of the recent Notices of Appearance of Counsel on behalf of Plaintiff Latasha Holloway (ECF No. 48, 50), Plaintiff, by counsel, pursuant to Fed. R. Civ. P. 15(a)(2) and Local Rule 7, hereby moves this Court to grant Plaintiff leave to file an amended complaint with additional parties within 60 days from the date of this filing. Plaintiff also moves to withdraw her pending motions to certify a class, for a preliminary injunction, and to reconsider the appointment of counsel (ECF. Nos. 34, 35, 37) without prejudice. If Plaintiff is granted leave to file an amended complaint, Plaintiff moves to withdraw all of her pending motions (ECF Nos. 28, 32, 33, 41, 43, and 46). Plaintiff’s counsel has conferred with Defendant’s counsel. Defendant does not oppose Plaintiff’s motion to withdraw her *pro se* motions but has reserved judgment on the motion to file an amended complaint until the second amended complaint is filed.

Respectfully submitted,

/s/ Charquia Wright

Charquia Wright (Virginia Bar No. 92972)
J. Gerald Hebert (Virginia Bar No. 38432)

Paul M. Smith (*pro hac vice* pending)
Danielle Lang (*pro hac vice* pending)
1411 K Street NW, Suite 1400
Washington, D.C. 20005
Tel.: (202) 736-2200
Fax: (202) 736-2222
Email: cwright@campaignlegal.org
ghebert@campaignlegal.org
psmith@campaignlegal.org
dlang@campaignlegal.org

/s/ Ruth Greenwood

Ruth Greenwood (*pro hac vice* pending)
Annabelle Harless (*pro hac vice* pending)
Campaign Legal Center
73 W Monroe St, Suite 302
Chicago IL 60603
Tel: (312) 561-5508
Fax: (202) 736-2222
Email: rgreenwood@campaignlegal.org
aharless@campaignlegal.org

Counsel for Plaintiff Latasha Holloway

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of September, 2018. I transmitted the foregoing document to the named parties' emails by means of an electronic filing pursuant to the ECF system.

/s/ Charquia Wright

Charquia Wright (Virginia Bar No. 92972)

Campaign Legal Center

1411 K Street NW, Suite 1400

Washington, D.C. 20005

Tel.: (202) 736-2200

Fax: (202) 736-2222

Email: cwright@campaignlegal.org